

**IN THE UNITED STATE DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Summit Family Medical Practice, P.C.

v.

The Philadelphia Contributionship Insurance Company

CIVIL ACTION

NO. 02-3783

**PLAINTIFF'S MOTION FOR LEAVE TO ALLOW ADDITIONAL
INTERROGATORIES AND RESPONSE TO DEFENDANT'S
MOTION FOR RECONSIDERATION OF THE ORDER GRANTING
PLAINTIFF'S MOTION TO COMPEL DISCOVERY**

The Plaintiff, Summit Family Medical Practice, P.C., by and through its counsel Fineman & Bach, P.C., respectfully moves this Honorable Court to grant leave to allow additional interrogatories and to deny Defendant's Motion for Reconsideration of the Order Granting Plaintiff's Motion to Compel Discovery and for Protective Order. In Support of its Motion, Plaintiff respectfully refers this Honorable Court to the attached Memorandum of Law.

Respectfully submitted,

FINEMAN & BACH, P.C.

Dated: _____

By: _____
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